

1 is, and I was like I've been hearing about it. And
2 she was like, well, that's what I am. And I was
3 like, well, that's cool. And she basically started
4 telling me all about what transgenders were. And I
5 said, well, I've always felt this way and this way.
6 So she gave me some literature, little pamphlets
7 from California state prisons that mentioned -- and
8 she was like I take hormones. I'm like they let
9 you do that in prison? And she was like yes. I'm
10 like, well, I've actually for a few years been
11 wanting to do that. I just figured I'd have to
12 wait till the streets to obtain hormone therapy.
13 And she was like, well, no, if you petition now,
14 you might be able to get on it if they feel that
15 you actually have a need. So I put in for it.

16 Q So at the time you spoke with Pearl, did you just
17 say you had wanted to take hormones for a few
18 years?

19 A Yes. I had seen it on TV. We have nothing to do
20 in prison but watch TV.

21 Q But you als- --

22 A And -- sorry.

23 Q Excuse me. You also stated at the time you spoke
24 with Pearl you had not heard of transgenderism?

25 A I hadn't heard specifically what a transgender was.

1 I had only heard that there was people who were
2 taking hormones to change their physical body.

3 Q And you didn't realize that when that
4 transgender told you that?

5 A Not really. I don't have access to look things up
6 in prison.

7 Q What did Pearl tell you about getting hormones?

8 A I'm sorry?

9 Q What did Pearl tell you about getting hormones?

10 A Just that she was on them and if I felt like it
11 would make my life better, she recommended me
12 talking to my psych doctor. So I did so.

13 Q What did she recommend you say to your doctor?

14 A She didn't recommend me to say anything to my
15 doctor. She just told me to tell them that -- how
16 I felt, who I was. And since I now had a firm term
17 for what I felt inside, that I was a girl, that I
18 am a girl, so I went and told my psych doctor.

19 Q In the California literature you mentioned from
20 Pearl --

21 A Uh-huh.

22 Q -- did that describe to you how to talk about your
23 identity?

24 A No, it did not. It only mentioned possible legal
25 recourses if you were denied.

1 Q Why did you request estrogen specifically on
2 July 22nd, 2019?

3 A Because that was what Pearl was on. I figured if
4 that's what Pearl was on to get to be who she was
5 on the inside, that's what I wanted to be on so I
6 could also reach that same goal.

7 Q How long did you think about asking for estrogen
8 before you asked for it?

9 A Um, I'd say maybe a few months after having the
10 conversation with Pearl.

11 Q Did you talk with anyone else about your
12 transgender identity between the time you talked
13 with Pearl and July 22nd, 2019?

14 A No, because it's -- it wasn't safe to express who
15 you are. It's still not safe. I just have grown
16 very comfortable being me, and now I don't let
17 people force me to not be who I am. So I -- I hid
18 talking to anyone. You -- I had enough targets on
19 my back. When you're in prison with the case that
20 I have mentioning, hey, I'm also transgender, a
21 girl, go ahead and use and abuse me, that's kind of
22 like a red flag here. People immediately think
23 that you're weak and able to be used for whatever
24 they want, especially once you start saying you're
25 a girl. It's not easier admitting I'm transgender,

1 it's harder.

2 Q Did you have any other accommodations or treatments
3 in mind besides estrogen on July 22nd, 2019?

4 A No. At that point, I didn't even realize
5 everything I might be able to obtain. For me, it
6 was I can feminize. I can feel comfortable in my
7 body. I didn't know that Estrogen at the time was
8 not a miracle drug and wouldn't just solve all of
9 my problems. So at the time, no, I did not.

10 Q When you met with Dr. Gale on July 22nd, 2019, to
11 announce your transgender identity, did you have
12 any doubt or ambivalence?

13 A No. This -- this absolutely seemed the right
14 choice to make. In fact, it wasn't even a choice
15 for me. It was like finally shining a light on --
16 on who I was.

17 Q If you could look at State 593 again.

18 A Uh-huh.

19 Q The next long paragraph below where we just were --

20 A Uh-huh.

21 Q -- the explanation note writes "He pointed to his
22 tattoos of women around his face and arms, saying
23 that this is evidence of his feminine identity."

24 Is that accurate?

25 A No, it is not. The problem when psych doctors take

1 notes is they shorten everything; otherwise, he'd
2 have, you know, a couple pages of my interview.
3 For this, he's actually simply mentioning that I
4 said it was evidence of my feminine identity,
5 because every tattoo on me, almost every one,
6 90 percent, is of a female figure. It was the only
7 way I felt to express my feminine inside on the
8 outside in a safe way that no one would judge or --
9 or abuse me for. If you look, they're all girls.

10 Q Okay. Just let me clarify that because you're
11 saying this note may not be accurate, but are you
12 saying that your tattoos --

13 A I --

14 Q -- of women do reflect your transgender identity?

15 A It was the way that I could express my transgender
16 identity at the time and in the past. I could
17 express I was a girl through girl tattoos on me
18 because it was like drawing a picture of yourself
19 except I'm putting it on my body. It's hiding in
20 plain sight. I'm able to express who I am without
21 telling everyone.

22 Q Did people understand the reason for you putting
23 tattoos on your body was because you identified as
24 a girl?

25 A Absolutely not.

1 Q Did you tell anyone that?

2 A I told Dr. Gale, and then I've told --

3 Q Is this note accurate then?

4 A It is not. It is not completely accurate. What
5 he's saying here is that it's evidence of my
6 feminine identity but doesn't explain why it's
7 evidence of my feminine identity. I just wanted to
8 make sure that was well noted, so it doesn't seem
9 like I've got tattoos, I'm a girl. No. I got
10 tattoos to express I am a girl.

11 Q A couple sentences later, Dr. Gale writes "Although
12 his initial report was unclear regarding when he
13 first began to identify as a transwoman, he
14 indicates that it goes back some time." Do you
15 recall what you told Dr. Gale about when you first
16 began to identify as trans?

17 A Only that I was vague in my understanding of
18 exactly when I knew exactly that I was transgender.
19 I always knew I was a girl, didn't know that term
20 applied, because until I talked to Pearl, I didn't
21 even really know transgender was the name for it.
22 I was hearing at the time that it was
23 transsexualism, is what I was hearing, and that
24 didn't seem to fit me because it was apparently
25 people that like to wear girl clothes to have sex.

1 It was weird. We only get stuff like taboo and
2 weird sex, and that's where I started hearing stuff
3 like that. It wasn't very informative.

4 Q On this date, what was your goal with identifying
5 yourself as transgender?

6 A To begin to have my body on the outside represent
7 who I was on the inside.

8 Q What did a full transition look -- or what did you
9 conceive a full transition to be on this date?

10 A Oh, I actually did not know at the time that I
11 could -- that I would eventually be able to receive
12 anything more than estrogen.

13 I -- when I requested at CIF to have the
14 bottom surgery, I thought I was pioneering new
15 ground. I didn't know IDOC actually had a policy.
16 I was just making an argument so that if I had to,
17 I would be able to prove that I was actually
18 working towards being me. I wanted to be able to
19 show that I was doing extra work for grievances and
20 so forth whenever, oh, well we don't see you doing
21 any of your own work on these grievances or showing
22 that you have a need for this. A lot of times IDOC
23 won't give you anything unless you actually need
24 it. They don't -- they're not a want facility.

25 Q So are you saying you filed a grievance for surgery

1 not because you wanted it but just to make a record
2 of something?

3 A I didn't file a grievance for -- for surgery. I
4 said I was preparing evidence if I needed to for a
5 grievance.

6 Q But you didn't really want surgery at that time?

7 A At the time, no, I didn't even know that it was a
8 possibility, but I wanted it as soon as I hit the
9 street at the earliest.

10 Q So when you are released from prison, you want
11 surgery?

12 A I want sur- --

13 MR. FALK: Objection. That's not -- that's
14 not what he said. You're asking about what he was
15 thinking about back in 2019, I believe.

16 MR. CARLISLE: Well, let me clarify.

17 Q When did you first file a grievance related to this
18 case?

19 A I first filed a grievance whenever I was actually
20 told that Indiana Department of Corrections would
21 no longer be providing surgeries with
22 Dr. Faluzia (phonetic), Falazia (phonetic) then,
23 because up till then I had been told in progressive
24 ways that it was moving forward. So I had no need
25 to file a grievance because it would have been

1 thrown out immediately anyways because they were
2 trying to get me towards more -- even though they
3 were completely stonewalling me, they were still
4 moving slowly forward.

5 Q So at the time you filed your grievance, you
6 understood that surgery was not an imminent
7 possibility?

8 A No. I actually thought that I would be able to
9 make quite a bit of headway on it if I was
10 consistent. Because every day spent suffering is
11 horrible, and I thought that if I was just patient
12 and showed patience, then I'd be able to get to
13 where I need to be so I'm not hurting.

14 Q So you filed your grievance to make a record, not
15 because you actually wanted the surgery? Is that
16 your testimony?

17 MR. FALK: That is not -- that is not her
18 testimony, so I'll object to that, that
19 characterization. You can -- you can testify on
20 your own, but that is -- that is not what she said.

21 Q Yeah, I'm asking you to clarify. The question is,
22 is that your testimony?

23 A I filed a grievance once I was told that everything
24 I had been working towards stopped right then and
25 there. I filed it because they were making me

1 still suffer and I felt that was wrong. It wasn't
2 their right to choose to deny me some kind of
3 relief from the pain I felt, from the pain I
4 constantly feel.

5 Q At the time you filed that grievance, you were
6 still receiving hormones?

7 A Hormones, yes, which help a little bit but they
8 don't solve the problem.

9 Q And you were still receiving psychotherapy?

10 A My psychotherapy has become my own personal work
11 through meditation and spirituality. Psychology in
12 prison does not offer any kind of real help. They
13 give you pat answers and try to push medication
14 upon you. I didn't want that. I wanted to be a
15 better person on the inside, so I had to seek all
16 my own solutions.

17 Q Are you denying your psychotherapists in DOC have
18 helped you?

19 A No. I'm denying that ultimately they can't help me
20 as much in IDOC because of restrictions than they
21 could on the streets.

22 MR. FALK: And I'm going to object to the
23 characterization of psychotherapy. I don't think
24 -- I don't think she's been receiving
25 psychotherapy. She has -- the medical records

1 reflect that counseling she's received, but I don't
2 think any of it can actually be described as
3 psychotherapy.

4 A I apologize. Yes. I thought psychotherapy was
5 counseling, so yes, like -- Mr. Falk is correct. I
6 had counseling. I haven't actually received, as
7 far as I'm aware, psychotherapy, the -- but
8 counseling I received about every 90 days. More
9 consistent with Dr. Gale being I requested it.

10 Q When did you learn what the diagnostic criteria for
11 gender dysphoria was?

12 A Whenever I printed off and looked at the WPATH
13 standards for care, which I got printed off in this
14 facility a couple months ago.

15 Q Are you referring to WPATH?

16 A WPATH SOC8.

17 Q And before Branchville gave you a copy of --

18 A Oh -- I'm sorry.

19 Q -- WPATH, you didn't know what the diagnostic
20 criteria for gender dysphoria was?

21 MR. FALK: And I'm just going to object to the
22 question just because I think she's going to tell
23 you Branchville did not give it to her, that that's
24 what she was trying to say.

25 Q Before you received a copy of WPATH while at

1 Branchville, you did not know what the diagnostic
2 criteria for gender dysphoria was?

3 A I did not. I like to be knowledgeable on my own
4 personal problems. And since I'm suffering from
5 this, I'm constantly trying to understand how best
6 to relieve my suffering.

7 Q Do you understand gender dysphoria as a mental
8 illness?

9 A I understand that it is labeled as a mental health
10 issue, yes.

11 Q Do you agree with that?

12 A I believe that it causes me no amount of suffering
13 and -- but whereas most mental health issues have
14 no cure, with gender dysphoria, once I'm fully able
15 to express on the outside being a girl, I believe
16 I'll be cured. And so, yes, technically it is a
17 mental health issue and I can see that, but I see
18 an end to my suffering, not a continuation or a
19 dumbing down of my problem.

20 Q Why do you -- you mentioned the cure. Why do you
21 believe anything will cure your gender dysphoria?

22 A Because when this body is not right, when -- when
23 you're forced to have something between your legs
24 that is just gross and wrong, it -- you understand
25 that once that's gone and it's no longer there

1 constantly having to feel it between your legs,
2 constantly having to see it, no matter how much I
3 try to cover it and -- but you know that once it
4 changes into what you see when you close your eyes
5 and momentarily pretend it's not there and that
6 relief that floods you, then you understand that
7 you -- everything that I suffer from stems from
8 this (indicating).

9 I could have no breast enhancements. I could
10 have absolutely no other feminization, but the fact
11 that I have this thing between my legs, it's not
12 right. It's wrong. God doesn't make mistakes, but
13 I felt he made one of this.

14 Q Besides what you're describing as your -- your
15 feelings and your own understanding, is there
16 anything else that informs your belief that there
17 -- something can cure your gender dysphoria?

18 A Yes, because everything can be fixed. Everything
19 can be broken, but if you put enough time and
20 effort and you actually try hard enough, everything
21 can be fixed.

22 Q Let me just sort of ask it one more time. So --
23 and I'll try to be clearer. Is there any other
24 source or person, literature, article you read that
25 influences your belief that something can cure

1 gender dysphoria?

2 A No. It is just a personal belief.

3 MR. CARLISLE: Can we take a break? Let's go
4 off the record.

5 VIDEOGRAPHER: We're going off the record at
6 10:43 a.m.

7 (A brief recess was taken.)

8 VIDEOGRAPHER: And we are back on the record
9 at 10:56 a.m.

10 Q Who -- what is Pearl's real name?

11 A That, I have no idea. I respected her name.

12 Q Any identifying information you can give me about
13 Pearl?

14 A Just that she was transgender and her name was
15 Pearl.

16 Q What did she look like?

17 A Well, 5 foot 10, cornrows.

18 Q What race?

19 A She is African-American.

20 Q Did you know any other transgender prisoners at any
21 facility before Branchville?

22 A No.

23 Q Just Pearl?

24 A Just Pearl.

25 Q If you'd go back to Exhibit 51 real fast, please.

1 A Uh-huh.

2 Q The first page is State 6185. And if you go to the
3 second page, State 6186.

4 A Yep.

5 Q You see the last sentence of the first full
6 paragraph, it says "She was mad when she caught me
7 wearing her clothing." I believe that's referring
8 to your wife. Do you see that?

9 A I see that.

10 Q Was Linda mad when she caught you wearing her
11 clothing?

12 A Again, I don't actually recall her ever catching me
13 wearing her clothing. I -- I stated earlier that.

14 Q So this sentence is inaccurate?

15 A Yes.

16 Q Do you always tell the truth when you talk to
17 mental health professionals or PREA coordinators?

18 A No.

19 Q When do you lie?

20 A Whenever it is in the best interest of my personal
21 and mental safety.

22 Q Did you lie here on State 6186 by saying Linda was
23 mad when she caught me wearing her clothing?

24 MR. FALK: Objection, asked and answered.

25 Q Did you say that?

1 A No.

2 Q So that's just an entire fabri- -- that's an entire
3 fabrication?

4 A I don't think it --

5 MR. FALK: Again, I'm going to object. I
6 think the witness previously testified that the
7 person transcribing it could have put together
8 other things that she was saying at the time in an
9 attempt to impress the notes.

10 MR. CARLISLE: Well, I don't know she put it
11 quite like that, but let's move on to Exhibit 55.

12 (Exhibit 55.)

13 Q The first page is State 1596. It would be Tab 7 in
14 the binders. And if you could go to page 1748,
15 please.

16 A I'm there.

17 Q This is a record of a Gender Dysphoria Evaluation;
18 do you see that?

19 A Yes, I do.

20 Q And the date of this document is 4-2-2020?

21 A Yes.

22 Q And this document was written by Dr. Corissa
23 Dionisio, M.D.?

24 A Yes.

25 Q Are you familiar with Dr. Dionisio?

1 A I only remember that she was the person who I had
2 to see about receiving hormones.

3 Q How many times did you meet with Dr. Dionisio?

4 A Once that I'm aware of.

5 Q Did you tell her the truth when you met with her?

6 A I told her everything that I could when she asked
7 me questions. And it was the truth, yes.

8 Q Do you trust your psych doctors?

9 MR. FALK: Again, I'm going to -- just for the
10 record, you need to be more specific. I mean,
11 there's -- when you say psych doctors, are you
12 talking about a counselor who isn't a doctor, are
13 you talking about a psychologist who's a Ph.D., are
14 you talking about a psychiatrist?

15 MR. CARLISLE: Well, I mean --

16 MR. FALK: I mean to me mental health staff,
17 that's fine, too, but I just want to make sure that
18 the witness understands what the question is.

19 Q Do you trust your doctors?

20 A Some and some not.

21 Q Did you trust Dr. Dionisio?

22 A No.

23 Q Why not?

24 A Because Dr. Dionisio attempted to get me to say
25 things that I did not feel comfortable with saying

1 without getting to know me first.

2 Q All right. Let's look at the first page,
3 State 1748. Are you there?

4 A Yes.

5 Q Okay. Do you see down at the bottom, second full
6 paragraph, the last sentence states "Expresses
7 distrust of psych doctors"? Do you see that?

8 A Yes.

9 Q So is that an accurate statement?

10 A As definition of psych doctors to me means a lot of
11 different things, but yes, I did say that to her,
12 those words.

13 Q But it sounds like you discussed the issue of
14 trusting your doctors with Dr. Dionisio?

15 A Yes.

16 Q Do you recall what you told her?

17 A I might have given her reasons for distrusting my
18 psych doctors. It was awhile ago.

19 Q What reasons were those?

20 A That it takes a long time to build up a comfortable
21 repertoire with your psych doctor. You have to
22 trust your psych doctor to open up to your psych
23 doctor.

24 Q Does it take more than two hours to do that?

25 A No. It depends upon the person who's asking and in

1 what way they're asking you, like what the context
2 is.

3 Q What do you mean by that?

4 A Okay. So if I'm meeting a psych doctor for the
5 first time and they're asking me to explain to them
6 how I felt about my father raping me, I might need
7 time to get comfortable with that individual. And
8 so I might see it as an invasion of my privacy from
9 a psychiatric doctor that attempts that. But if I
10 meet a psych doctor who tells me I need -- they
11 need to know statistics such as how long have I
12 been not eating, that's comfortable questions
13 easily able to be answered and able to be trusted
14 in that record. If you get extremely personal and
15 try to delve in my deep parts of my life without
16 taking the time to know me, it hurts.

17 Q And so someone could delve into the details of your
18 life in under two hours?

19 A No.

20 Q If you could look at State 1750, please.

21 A Here we are.

22 Q Are you there?

23 A Yes.

24 Q Okay. Toward the top, I want to point your
25 attention to the third paragraph toward the end.

1 A Okay.

2 Q The sentence starting "Denies AVH," do you see
3 that?

4 A I'm looking for it. I apologize. Yes, I found it.
5 Denies current SI/HI or --

6 Q Yes.

7 A Denies AVH, found it.

8 Q Denies AVH. And do you understand that to mean
9 audiovisual hallucinations?

10 A I didn't know that's what AVH was, but I know what
11 audiovisual hallucinations are.

12 Q Does that make sense in the context of one of
13 your --

14 A Yes.

15 Q Do you manipulate doctors to get things?

16 A Yes. Whenever I would attempt suicide, I had
17 obtained a medication in large quantities, and so I
18 had to convince them that I needed it in order to
19 kill myself. I told psych doctors this, that I can
20 be manipulative.

21 Q Do you see the following sentence states Reports
22 lying about having AH- -- excuse me, AVH in the
23 past to get on medications like Thorazine,
24 Tegretol; recognizes she has a level of
25 manipulative behavior? Was that accurate?

1 A Oh, yes. As I said, I have told psych doctors that
2 I can be manipulative. You can't build trust if
3 you're not willing to be honest.

4 Q Is being manipulative honest?

5 A There is positive and negative manipulations. I
6 told them as precursors to what kind of things
7 might -- I might do to manipulate the system, so
8 that they could err in what they provide me based
9 off that. If I know I cheat at cards and I don't
10 want to cheat at cards, I would tell the guy I'm
11 playing cards with I'm known to cheat at cards. So
12 if you see me doing something fishy, look into it.
13 I wanted honest help without the possibility of me
14 manipulating the situation for my own benefits.

15 Q If you could look at State 1750 down in the section
16 starting past psych history. Do you see that?

17 A Yes.

18 Q Okay. And then paragraph starting Dx, which I'll
19 represent means diagnosis, has a list including
20 MDD, polysubstance dependence, borderline
21 personality disorder, paranoid schizophrenia,
22 antisocial personality disorder. It goes on to say
23 "She reports PTSD, emotional handicap, megalomania,
24 narcissism, manic depressive, schizophrenia.
25 Disagrees with all diagnoses." Let me ask you

1 first is the sentence "Disagrees with all
2 diagnoses" an accurate statement of something
3 you've said?

4 A Oh, you're asking if I said disagrees with all
5 diagnoses?

6 Q Uh-huh. Yes.

7 A Yes.

8 Q Okay. And so are there any diagnoses within that
9 paragraph that you agree with?

10 A I believe that I have PTSD. I believe I'm
11 emotionally handicapped. I also have manic
12 depressive, and yes, I can tend to be narcissistic.
13 And I also tend to be a bit of a megalomaniac when
14 it comes to things like D&D. I'm the best at it.
15 Nobody else can beat me.

16 Q So you disagree with your borderline personality
17 disorder diagnosis?

18 A Absolutely. I actually worked to obtain that so I
19 could get on high enough doses of amitriptyline so
20 that I could overdose on it. I was in a coma for
21 20 days because of it.

22 Q Do you dispute that borderline personality disorder
23 still shows up in your medical records?

24 A No.

25 Q You disagree with your antisocial personality

1 disorder diagnosis?

2 A Yes.

3 Q Why?

4 A You've got to talk to me. I'm actually very
5 likeable.

6 Q Any other reason?

7 A I don't tend to have social problems with people.
8 The only thing I tend to have a problem with people
9 is whenever they don't respect me as being female
10 and try to force a guy upon me, then I tend to lash
11 out.

12 Q Trying to force what? I'm sorry.

13 A Me being a guy. I'm not a guy, but they try to
14 make me into a guy.

15 Q If you would look at the previous page, State 1749.

16 A Uh-huh.

17 Q Right in the middle, it says the "First mention of
18 transgender state in records." Do you see that?

19 A Yes.

20 Q In July 2019. So that's accurate, right?

21 A Uh-huh.

22 Q The next sentence, "Note expressions of sexual
23 fantasies with underage girls in therapy records."

24 Do you see that?

25 A Uh-huh.

1 Q Is that accurate?

2 A It is accurate in the point that I brought up the
3 fact that I had had sex with underage girls
4 whenever I was underage. My father used to make me
5 have sex with other girls underage. I also brought
6 up the fact that I had fantasies of -- not
7 fantasies but basically memories where I remember
8 being a child having sex with an adult. It doesn't
9 mean I want to. It just means that I remember
10 these things, and they bothered me that I had these
11 thoughts going around in my head.

12 Q So if I were to read your medical records, there
13 should be no other mention of you having sexual
14 fantasies with underage girls?

15 MR. FALK: Objection. He has no -- she has no
16 -- excuse me. She has no idea what's in her
17 medical records.

18 Q Have you ever told a doctor that you have sexual
19 fantasies with underage girls?

20 A Not in those specific words, no.

21 Q Did you ever tell a doctor you have unhealthy
22 sexual fantasies involving underage girls?

23 A No.

24 Q Okay. I have got one copy of this. I'm sorry,
25 it's last minute, so I'm going to show it to

1 counsel first before I show it to the witness.

2 A No problem.

3 (Exhibit 63.)

4 Q I'm going to show you what's been marked as
5 Exhibit 63.

6 A Okay. Thank you.

7 MR. FALK: What's the Bates stamp on that?

8 THE WITNESS: Four twenty- -- 4-22?

9 Q Can you read the Bates stamp on the bottom right?

10 A Oh. 000685.

11 MR. FALK: Thank you.

12 Q And it starts with State, correct?

13 A Yes.

14 Q And at the top, can you tell us the date?

15 A 4-24-2019, 3:02 p.m.

16 Q And if you could go to page 686, please.

17 A I am now there.

18 Q Do you see the Subjective Information?

19 A Yes.

20 Q The last sentence of that paragraph, does it state
21 "He also shared information about his 'unhealthy
22 sexual fantasies' involving underage girls"?

23 A I see that.

24 Q Is that accurate?

25 A No, it's not. Again, the context is wrong.

1 Q Going back to Exhibit 55, please.

2 A Would you like this back?

3 Q (Mr. Carlisle shakes head from side to side.)

4 State 1749. Are you there?

5 A I'm getting there. Hang on. Yes, I'm there.

6 Q If you could look at the third full paragraph
7 starting "While incarcerated."

8 A Uh-huh.

9 Q The third sentence states "Reports she has tried to
10 commit suicide in the past due to not being able to
11 express female gender identity."

12 A Yes.

13 Q Is that an accurate statement?

14 A Yes, it is.

15 Q When have you tried to commit suicide in the past
16 due to not being able to express your female gender
17 identity?

18 A Every time I've ever tried no commit suicide.

19 Q Every time ever?

20 A Yes.

21 Q Did you receive medical attention after your
22 suicide attempts?

23 A I'm in prison, so yes.

24 Q Did you ever tell a medical professional that the
25 reason you tried to kill yourself was not being

1 able to express female gender identity?

2 A No.

3 Q Why not?

4 A Because all I knew is I hated my body and I didn't
5 have terms for that back then. And telling a psych
6 doctor you hate their [sic] body and that's why you
7 tried to kill yourself is going to end you up in a
8 suicide cell and on more medication.

9 Q Have you ever been placed in a suicide cell?

10 A Yes, numerous times. I've had very bad experiences
11 in there.

12 Q So it sounds like even if you don't tell a doctor
13 that you tried to kill yourself for not being able
14 to express your gender identity, you could still
15 end up in a suicide cell?

16 A Yes. It's very fickle. I could end up in there
17 for any numerous amount of reasons not under my
18 control.

19 Q How many times have you tried to commit suicide
20 because you were not able to express your female
21 gender identity?

22 A Six plus times.

23 Q Were those all in prison?

24 A No. I attempted a few times on the street. I also
25 attempted in prison as well.

1 Q Okay. Let's break that down. The times on the
2 street --

3 A Uh-huh.

4 Q -- can you give me an approximation of when those
5 were?

6 A The one that I remember most, so I'll start with
7 that one, I was placed in the Mulberry Center after
8 attempting to cut my wrist with a pair of scissor
9 blades.

10 Q How old were you?

11 A Middle school, somewhere in my early -- 12, 13.

12 Q Any other time on the street?

13 A No, not -- no.

14 Q And then focusing after your incarceration, when
15 did you try to commit suicide?

16 A So start with specific ones and move on?

17 Q Yeah, if you -- if you could try to do it earliest
18 till --

19 A Chronologically?

20 Q Chronologically, if you could try, yes.

21 A Okay. I first attempted suicide in Pendleton. I
22 tried hanging myself in the bars. That one wasn't
23 found out. Another offender came along and got me
24 down from it and told me I shouldn't be trying to
25 kill myself.

1 The next time was when I overdosed on
2 medication. That would be the estra- -- not --
3 sorry. I apologize. The amitriptyline is also
4 called Elavil. That put me in a coma.

5 Q Okay. Can you have an approximate date -- do you
6 have position dates for the Pendleton and then the
7 next one, the medication?

8 A I -- early 2000s? It's hard for me to remember.
9 It all blends together after so long.

10 Q That's fine. Go ahead.

11 A Then I also attempted to overdose on Tegre- -- no,
12 that's later. I boiled my fingers off on my hot
13 pot and let them sit in an attempt to get
14 gangrenous. That was two separate occasions, one
15 finger one time, another finger another time.

16 Then there was the time that I overdosed on
17 Tegretol. This is no longer in Pendleton, by the
18 way. Oh, I missed one. I lit my cell on fire in
19 Pendleton. That one predates the Tegretol
20 overdose.

21 Q Okay. And then --

22 A Tegretol overdose in CIF. I attempted that three
23 different times. Once I was actually like found
24 unconscious and resuscitated by staff. The other
25 two times I came to, covered in my own puke in my

1 cell, as my body vomited.

2 Q And this is a different facility, in Pendleton at
3 this point?

4 A Wabash. My bad. I said CIF. Wabash.

5 Q Wabash?

6 A Yeah.

7 Q In approximately what year are we talking about?

8 A 2006, '7. I had just been released from the SHU.

9 Q Which is?

10 A Uh --

11 Q Solitary Housing Unit?

12 A Solitary, yeah, Housing.

13 Q And after the Tegretol about three times in '06 or
14 '07, any more attempts?

15 A I also tried in CIF to open up a vein in my wrist.
16 I never got through the tendon. I never reported
17 it. I let it heal and got a scar from it.

18 Q Any other attempts?

19 A Not that I can remember --

20 Q Okay. The -- the vein in your wrist incident --

21 A Yeah.

22 Q -- approximate year?

23 A 2013. There was a lot of self-harm, but I don't
24 remember any more suicide attempts.

25 Q That's the next place I'm going. If you could look

1 at State 1749, please.

2 A Still there.

3 Q Down toward the bottom do you see the
4 ^ sex ^ section titled "What if expectations are
5 not met"?

6 A Yes, I see that.

7 Q And the note states "If she didn't reach
8 expectations, would hopefully be able to reach out
9 to mental health providers." Do you see that?

10 A Yes, I do.

11 Q Do you understand the expectations there referring
12 to your treatment for gender dysphoria?

13 A Yes.

14 Q And then the note goes on to say "Would also try to
15 avoid self-harm as this has been her coping tool.
16 For past 10 years, hasn't had lots of self-harm or
17 suicide attempt. Cites this is due to 'getting to
18 know myself' - 'to know yourself is to love
19 yourself.'"

20 A Uh-huh.

21 Q Is that an accurate statement there?

22 A No.

23 Q Is it true that if your expectations are not met
24 regarding your gender dysphoria, you will avoid
25 self-harm?

1 A No. I cannot guarantee that.

2 Q Is it a true statement that in recent years you
3 have stopped trying to kill or harm yourself?

4 A Kill. Still harm from time to time.

5 Q So it's true you've stopped trying to kill
6 yourself?

7 A I have stopped focusing on it, yes. I still have
8 the thoughts and the urges and I struggle every day
9 not to do it.

10 Q But no attempts?

11 A No more attempts.

12 Q All right. Explain to me why it's not true that --
13 regarding self-harm.

14 A Because I have never felt safe in prison expressing
15 my urges to self-harm because of the way I feel and
16 how much I suffer. Because of what I have to deal
17 with, suicide cells, heavy medications I have been
18 told that if I go back to being suicidal, they
19 would remedicate me, and that fear makes me unable
20 to let them know how I really feel in prison.

21 Q Let me ask you a better question. Do you intend to
22 self-harm?

23 A I never want to self-harm, but I cannot control if
24 my suffering gets so bad that I don't resort to
25 such methods.

1 Q Have you had any self-harm attempts in the past few
2 years?

3 A Yes.

4 Q Okay. Describe those to me.

5 A Cutting. Well, cutting is my go-to. Physical
6 abuse by punching myself. Those are my self-harm.

7 Q Anything else?

8 A No. I mean -- yeah. No. Ligation. I attempted
9 to put rubberbands around my genitals on multiple
10 occasions. I can't -- it gets so painful, I
11 eventually can't tolerate it.

12 Q Let's start with cutting. In the past year, how
13 often have you cut yourself?

14 A Six times.

15 Q And where on your body do you cut yourself?

16 A Arms and legs, inner thighs, places I can hide it.

17 Q I'm sorry?

18 A Places I can hide it.

19 Q Do you ever seek medical treatment after you cut
20 yourself?

21 A No.

22 Q Why not?

23 A Because the medical treatment they would offer
24 would not help me. More medication is not the
25 solution.

1 Q So you don't want medical treatment for your habit
2 of cutting yourself?

3 A Oh, I want medical treatment. I just don't want
4 what they're offering here which is psychotropic
5 medications.

6 Q How often in the past year have you punched
7 yourself?

8 A Three times.

9 Q And where in your body do you punch yourself?

10 A In the stomach, in the groin.

11 Q And when were those times?

12 A Specific dates, hard to give you. I can give you
13 months.

14 Q Okay.

15 A Last month, January of this year. October of last
16 year and July of last year.

17 Q What were you thinking when you punched yourself
18 those three times?

19 A How much I hate my body and how much I just want it
20 to be changed, how much I want to no longer have a
21 penis.

22 Q So you have that thought every single time you've
23 punched yourself in the past year?

24 A Yes.

25 Q Why would you punch yourself in the stomach if

1 that's your thought?

2 A Because punching yourself down below is extremely
3 painful, and sometimes it's -- I can't bring myself
4 to that amount of pain. Sometimes I can and I do
5 punch myself in the genitalia, as I mentioned.

6 Q Of those three times you mentioned, which times did
7 you punch yourself in the stomach versus the groin?

8 A Once in the stomach, twice in the groin.

9 Q Which one was the groin?

10 A That would have been in January and that would have
11 been July.

12 Q January and July were in the groin?

13 A January of 2023 -- sorry, of 2024 and July of 2023.

14 Q Did you seek medical attention after you punched
15 yourself?

16 A No.

17 Q And is that for the same reason you did not seek
18 medical attention after you cut yourself?

19 A Yes.

20 Q All right. Let's talk about ligation. When did
21 you attempt ligation?

22 A I attempted it in November of last year. I --

23 Q What happened?

24 A The rubberbands aren't quite effective in the sense
25 that you would think. I can get them wrapped

1 around, and it can cut off blood flow, which
2 becomes extremely painful, but not enough to
3 actually sever it or get it to die.

4 Q Wrapped -- you -- so, okay, walk me through this.
5 You wrapped rubberbands around what?

6 A My testicles and my -- my -- my penis.

7 Q And why do you do that?

8 A I cannot stand it being there. I know I'm working
9 towards getting it removed.

10 Q And so you -- you've done this with rubberbands
11 just the one time in November of 2023?

12 A No. That was the most recent. I thought you
13 wanted me to start with the most recent.

14 Q When else have you done this?

15 A I did it in 2021 and I did it in 2015.

16 Q Did you receive any medical attention after you did
17 this on any of these three occasions?

18 A No.

19 Q And is that for the same reason that you did not
20 seek medical attention after you cut yourself?

21 A Yes.

22 Q You mentioned something about the rubberbands not
23 being effective?

24 A Uh-huh.

25 Q And can you explain that a little bit more.

1 A It's hard to get enough -- it tight enough to cut
2 off all blood flow so that it necrotizes and falls
3 off. It requires you to stop all blood flow to
4 accomplish that. I can get it to the point of
5 turning purple, swelling and getting extremely
6 painful but not to fall off.

7 Q You want your testicles to fall off; is that what
8 I'm hearing?

9 A Sometimes it is more difficult to have them, and
10 sometimes it doesn't feel like I will ever be rid
11 of them. And I fail as a person and subject myself
12 to try and remove them myself because I sometimes
13 don't think it will get better.

14 Q Okay. I'm just trying to understand. If you know
15 the rubberband method is not effective to make your
16 testicles fall off, why do you do it?

17 A Sometimes I hope just enough of it will cause
18 enough damage that it will have to be removed.

19 Q Have you ever harmed your genitals in any other
20 way?

21 A I have cut my genitals with a razor blade.

22 Q When did you do that?

23 A Sometime in 2008. I only did it once. It bled way
24 too much before I got any really deep into it, and
25 I was afraid that they would find out and stop me

1 or lock me up in a suicide cell.

2 Q You were bleeding that time?

3 A Yeah.

4 Q Did you receive medical attention for that?

5 A No, I didn't.

6 Q Did you tell anyone you were bleeding?

7 A No.

8 Q Did anyone see you? I guess no one saw you?

9 A I had a -- I had a single cell at the time.

10 Q Okay. If you could go back to State 1749 in
11 Exhibit 55, please.

12 A Yeah, I'm still there. Thank you.

13 Q Do you see the paragraph starting "Dropped out of
14 high school" --

15 A Um --

16 Q -- toward the top?

17 A Oh, 17555, right, is what you said?

18 Q 1749 in Exhibit 55.

19 A Oh, okay.

20 MR. FALK: It's the third paragraph.

21 A Here we are.

22 Q If you can look toward the end starting with
23 "Currently incarcerated," do you see that?

24 A Yes.

25 Q All right. The record states "Currently

1 incarcerated for murder of stepdaughter. She feels
2 she caused the death of her stepdaughter due to not
3 being able to express herself (anger, sadness).
4 Was abusive and caused death of child in her care.
5 She reports part of her decision making in murder
6 were due to anger of not being able to express
7 herself." Does -- does that -- did you tell
8 Dr. Dionisio that part of the reason you murdered
9 your stepdaughter was because you couldn't express
10 your gender identity?

11 A I do not remember if it was Dr. Dionisio. I
12 remember telling Dr. Gale this. I -- he asked me
13 if I thought my inability to express myself came
14 from -- ended up resulting in Faith's death. And I
15 told him that I had had a long time to think about
16 it and that I felt that because I couldn't express
17 myself, I let it build in me like a venom until I
18 hated myself so much. Because I was weak and
19 didn't take it out on myself, I instead took it out
20 on somebody who couldn't defend themselves. And
21 that's inexcusable.

22 Q So I'm just trying to understand. Did you express
23 to a medical professional that part of the
24 motivation for that action was due to you not being
25 able to express your gender identity?

1 A Yes.

2 Q Have you ever considered that your transgender
3 identity is just --

4 A Can I --

5 MS. PACTOR: Can we take a break, please?

6 MR. FALK: Can we take a break?

7 MR. CARLISLE: Let's go off the record.

8 MR. FALK: Let's go off the record.

9 VIDEOGRAPHER: We're going off the record at
10 11:30 a.m.

11 (A brief recess was taken.)

12 VIDEOGRAPHER: We are back on the record at
13 11:31 a.m.

14 Q Have you ever considered that your transgender
15 identity is an attempt to explain away your actions
16 toward your stepdaughter?

17 A I actually thought about that, is this just some
18 excuse to make myself feel better. No. I know why
19 I suffered. I know why I blew up, and there's no
20 excuse for why she -- she died. I failed. I
21 failed as a human being and as a parent. Me being
22 transgender and me not being able to express myself
23 was a factor, but that doesn't make that the
24 excuse, not in the slightest.

25 Q Let's go to page State 1726 of Exhibit 55, please.

1 A I'm there.

2 Q One moment. Sorry. Okay. State 1726 of
3 Exhibit 55 is part of a -- a record where you were
4 formally diagnosed with gender dysphoria. Do you
5 see that?

6 A Yes.

7 Q And the date here on the previous page is 6-17-20?

8 A Yes.

9 Q So in June 2020 you were formally diagnosed with
10 gender dysphoria?

11 A Yes, I believe so.

12 Q On or about that date?

13 A Yeah.

14 Q And at State 1726 are some of the notes from the
15 committee conference, and I'm going to draw your
16 attention to the second full paragraph. Are you
17 there?

18 A Yes.

19 Q The text reads "Primary among the concerns that
20 were raised were Richardson's history of self-harm,
21 self-mutilation, and drastic changes in physical
22 appearance. Richardson's arms are covered in
23 self-inflicted burn scars, she is missing joints
24 from fingers from intentionally cooking them in a
25 prison hot pot, and her head and face have been

1 decorated with extensive tattooing. There was some
2 concern that hormone treatment and the
3 gender-affirming surgery that Richardson says she
4 would eventually like to pursue may represent steps
5 in the evolution over time of self-mutilating
6 behavior." Do you think it was -- do you think
7 that is a reasonable concern of the medical
8 professionals to have?

9 A No.

10 Q Why not?

11 A Because it's like apples and oranges. They're
12 trying to say that because I'm a girl and I want my
13 body to reflect that I'm a girl, that that's a way
14 of hurting myself. If it was a way of hurting
15 myself, I would stay a guy. Like staying like
16 this, most self-hurting way I could possibly live
17 my life.

18 Q Psychologically speaking?

19 A Psychologically, physically, and emotionally.

20 Q But do you have a -- an urge to feel physical harm
21 on your body?

22 A No. It is a way that I can sometimes control my
23 overwhelming emotions.

24 Q So sometimes pain -- physical pain for you is a
25 method of control?

1 A Sometimes it seems like the only thing I can
2 control in my life is the pain I inflict on myself.

3 Q When you inflict pain on yourself, is it cathartic
4 or relieving in some manner?

5 A A little bit.

6 Q If you could go to page 1693 of Exhibit 55.

7 A What number was that again?

8 Q 1693.

9 A Oh, I was going to seventeen ninety- -- I was like
10 -- I'm there.

11 Q Page 1693 is a medical record dated 8-27-20,
12 correct?

13 A Yes.

14 Q And this is a couple months after you were
15 diagnosed with gender dysphoria, right?

16 A Yes, I believe so.

17 Q And it looks like this is a psychotherapy visit.
18 Do you see at the top of 1693?

19 A Yes.

20 Q If you could go to the next page, 1694, where the
21 Subjective Information note is. Are you there?

22 A Yes, I am.

23 Q In that note is stated "She reports that she is
24 encouraged to notice some breast tissue development
25 already since being on hormone therapy a relatively

1 short time." Do you see that?

2 A Yes.

3 Q Okay. So it sounds like DOC, within two months of
4 your official diagnosis, had started you on hormone
5 therapy?

6 A Um, I mean, I guess. Again, I don't know
7 specifically the date, but if that's what it says,
8 maybe.

9 Q You have no reason to dispute that, right?

10 A No.

11 Q And it sounds like the effects of the hormone
12 therapy were already being realized?

13 A Yes.

14 Q Are you satisfied with -- let me ask you this: At
15 -- on -- at this date, 8-2020, were you satisfied
16 with the appearance of your breasts?

17 A No.

18 Q Are you satisfied with the appearance of your
19 breasts today?

20 A I feel more complete but not whole.

21 Q Has there ever been a point since June 2020 where
22 you've been satisfied completely with the
23 appearance of your breasts?

24 A It hasn't been entirely on my mind recently.

25 Q Anytime since June 2020?

1 A Oh. So no. Not completely satisfied, no.

2 Q What will make you completely satisfied with the
3 appearance of your breasts?

4 MR. FALK: Okay. I'm going to -- again, you
5 can ask, but I'm going to object. This isn't --
6 this case, we're not asking for top surgery, and
7 these questions are irrelevant to the point of this
8 lawsuit and certainly irrelevant to the litigation
9 challenge and the statute, but you can go ahead and
10 answer.

11 A I think at some point after I have achieved the
12 fundamental thing of being a woman, a vagina, I
13 will have a chance to put more thought into that.
14 I haven't had a chance yet to really think about
15 what I want my breasts to fully be until I really
16 know what I'm going to fully be.

17 Q Okay. Can you go to Exhibit 52, please, it should
18 be Tab 4 in the binders. It starts with State
19 2937.

20 (Exhibit 52.)

21 A I'm there.

22 Q All right. This exhibit is titled Medication
23 Administration Record. Do you see that?

24 MR. FALK: I'm sorry, Alex. What's the number
25 on the exhibit just for my notes?

1 MR. CARLISLE: 52.

2 MR. FALK: Thank you.

3 A And what were you asking?

4 Q The title at the top of 2937 is Medication
5 Administration Record?

6 A Yes.

7 Q And if you look, it looks like this is a record of
8 your hormone regimen?

9 A Yes.

10 Q And it looks like you receive estradiol?

11 A Yes.

12 Q Did I pronounce that right?

13 A I believe so.

14 Q Okay. And spironolactone otherwise known as spiro?

15 A Yes.

16 Q And this first page is for August 2022, and it
17 looks like you received those two things about
18 daily; is that accurate?

19 A I take -- I took my medication every day, yes.

20 Q Okay. And estradiol is an estrogen supplement,
21 correct?

22 A Yes.

23 Q And spiro is a testosterone suppressant; is that
24 accurate?

25 A I believe an antiandrogen, testosterone blocker.

1 Q Okay. And so I'll represent to you that the rest
2 of these pages are other months of your medication
3 administration record. Do you see that?

4 A Yes.

5 Q And it looks like you've been receiving hormones
6 consistently for many months; is that accurate?

7 A Yes.

8 Q Have you been receiving hormones since around
9 August 2020, thereabouts?

10 A Yes.

11 Q And your hormone regimen has been regulated and
12 monitored?

13 A No.

14 Q It hasn't?

15 A No.

16 Q Has your hormone regimen ever been changed in any
17 way?

18 A It has, but under my request and a lot of times I
19 have to request blood draws as well, they don't do
20 consistent blood draws either to check my levels.
21 They're supposed to occur every 90 days.

22 Q Has your hormone regimen resulted in you being
23 hormonally reassigned?

24 A I mean, I believe -- I believe that my levels are
25 within the female's level ranges. Is that what you

1 mean?

2 Q Yeah. So do you agree you have the same
3 circulating sex hormones as a female?

4 A Yes.

5 Q In addition to hormone therapy, how else has DOC
6 addressed your gender dysphoria?

7 A They have allowed me to purchase undergarments.
8 They have allowed me makeup until makeup was
9 removed from commissary. They have allowed me to
10 use my pronouns. They don't always use them, but I
11 can generally ask an officer to respect it. And
12 they usually let me wear tighter clothing than most
13 people, but that's usually my choice and they just
14 don't give me an issue about it.

15 Q What about ongoing therapy?

16 A Not really.

17 Q You haven't received therapy?

18 A I mean, I have had counselors ask me how I'm doing,
19 and Dr. Gale gave me a few times asking about how I
20 was doing on my medication, but -- and Dr.
21 Martinez, too, but that was all CIF. But not
22 really. They don't inquire how is my transitioning
23 going. They don't inquire how I'm feeling
24 concerning my -- my transition or how am I -- I'm
25 dealing with -- in coping with the problems in a

1 male prison and not being fully transitioned. None
2 of that is discussed.

3 Q You're not disputing you meet regularly with mental
4 health professionals, are you?

5 A Yes, I am.

6 Q You are?

7 A I have seen mental health professionals here since
8 last year of -- '05, like -- you know, January,
9 February, March, April, May. I've seen them three,
10 four times. That's not even the 90 days -- every
11 90 days that my health code requires.

12 Q Are you contesting in this litigation that your
13 mental health treatment has been insufficient?

14 A I'm contesting -- well, I'm not really contesting
15 anything. I'm just simply stating that they don't
16 give me the care that they're claiming, I guess.

17 Q What is a transgender access card?

18 A It is simply a card that tells what things I'm
19 allowed as a transgender. Undergarments, though
20 anyone can buy undergarments off commissary, not
21 just us transgenders, and pronouns, which again,
22 I'm not allowed to enforce. They just are taken as
23 a recommendation for officer behavior. Officers
24 can still call me he, him, Mr. Richardson if that's
25 how they feel.

1 Q And you have one of these transgender access cards?

2 A Yes, I do.

3 Q Do other prisoners use your preferred pronouns?

4 A Those who care about me. The ones who don't like
5 me rub it in my face, the other pronouns, go out of
6 their way.

7 Q You mentioned this doctor earlier. Are you
8 familiar with Dr. Farjellah, I think his name is?

9 A I met him twice in a videoconference, so --

10 Q And he's a psychologist?

11 A I did not know what his specific title was.

12 Q Do you have any reason to doubt he's a
13 psychologist?

14 A Oh, no. I just was saying I just didn't know.

15 Q You saw him twice, you said?

16 A Twice, yeah.

17 Q Since being transferred to Branchville?

18 A Yeah. Yeah. Maybe -- wait. It might have been
19 three times because I believe he called me down
20 about my grievances. Three at the most.

21 Q If you could look at Exhibit 54, please. It starts
22 State 1022.

23 (Exhibit 54.)

24 A Yes, I'm there.

25 Q If you could turn to page 1132 in Exhibit 54.

1 A Okay. Well, I've got a rubberband, so hold on.
2 Did I grab yours?

3 Q No.

4 A Thanks. It's a little hard missing fingers. You
5 said 11- -- 1034 or 1134?

6 MS. PACTOR: 1132, I believe.

7 Q Is that what I said? 1132.

8 A All right. Okay. I'm there.

9 Q Okay. At the top it looks like this is an
10 individual psychotherapy visit from May 8th, 2023?

11 A Okay.

12 Q Can you go to the next page, 1133?

13 A I'm there.

14 Q The -- Dr. Farjellah writes Patient recently
15 transferred from NCF. She identifies as
16 transgender. She has been incarcerated for murder
17 in 2001 in which she admitted that All I know is I
18 killed the little F'ing b-i-t-c-h, in quotations,
19 and the coroner stated that asphyxiation was the
20 cause of death of her infant daughter. Is that an
21 accurate summary?

22 A No. I -- I never stated that. It was stated in my
23 case, so he might have looked it up, saw that was
24 stated, and put it in there, but I never have ever
25 told anyone that. I still dispute it even from the